

FILED 09 FEB '22 16:56 USDC-ORP

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

3:22-cr- 00046-HZ

v.

INDICTMENT

FAYAO RONG,

**21 U.S.C. §§ 841(a)(1), 841(b)(1)(A), 846
and 853**

Defendant.

Forfeiture Allegation

THE GRAND JURY CHARGES:

**COUNT 1
(Conspiracy to Manufacture Marijuana)
21 U.S.C. §§ 841(a)(1), 841(b)(1)(A) and 846**

Beginning at a time unknown and continuing up to and including September 9, 2021, in the District of Oregon and elsewhere, **FAYAO RONG**, defendant herein, did knowingly and willfully combine, conspire, confederate, and agree together, with other persons known and unknown to the grand jury, to manufacture more than 1000 marijuana plants, a Schedule I controlled substance,

In violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A)(vii) and 846.

COUNT 2
(Conspiracy to Possess with the Intent to Distribute Marijuana)
21 U.S.C. §§ 841(a)(1), 841(b)(1)(A) and 846

Beginning at a time unknown and continuing up to and including September 9, 2021, in the District of Oregon and elsewhere, **FAYAO RONG**, defendant herein, did knowingly and willfully combine, conspire, confederate, and agree together, with other persons known and unknown to the grand jury, to possess with the intent to distribute more than 1000 marijuana plants, a Schedule I controlled substance,

In violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A)(vii) and 846.

CRIMINAL FORFEITURE ALLEGATION

Upon conviction of any of the controlled substance offenses as alleged in Counts 1 and 2 of this Indictment, **FAYAO RONG**, defendant herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violations, including but not limited to the following:

A money judgment for a sum of money equal to the amount of property representing the amount of proceeds obtained as a result of the controlled substances distributed as alleged in Counts 1 and 2 for which the defendants are jointly and severally liable.

If any of the above-described forfeitable property, as a result, of any act or omission of the defendants:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;

- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described above.

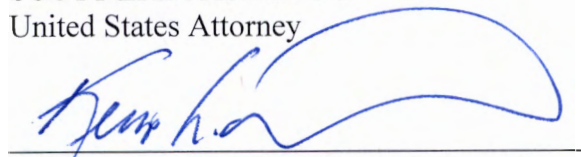
Dated February 9th, 2022.

A TRUE BILL.


OFFICIATING FOREPERSON

Presented by:

SCOTT ERIK ASPHAUG
United States Attorney


KEMP L. STRICKLAND, OSB #96118
Assistant United States Attorney